

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 23, 2008.

Permit Number: **R30-09300004-2008**  
Application Received: **July 19, 2012/July 25, 2012**  
Plant Identification Number: **03-54-093-00004**  
Permittee: **Kingsford Manufacturing Company**  
Facility Name: **Parsons Plant**  
Mailing Address: **P.O. Box 464, Parsons, WV 26287**

Permit Action Number: *MM03 & MM04*    Revised: *April 22, 2013*

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Physical Location:	Parsons, Tucker County, West Virginia
UTM Coordinates:	613.2 km Easting • 4326.2 km Northing • Zone 17
Directions:	The Facility is located on Route 219, about 2 miles South of Parsons

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### Facility Description

The Kingsford Manufacturing Company Parsons Plant is a charcoal manufacturing facility. It manufactures charcoal briquets from raw materials including wood/sawdust, char produced on-site and received from the Beryl plant, coal, limestone, sodium nitrate, starch, borax, and solvent for briquets.

Facility SIC Code: 2861 Chemicals and allied products - gum and wood chemicals.

The proposed Title V modification (MM03) incorporates changes associated with the administrative update R13-1608G for the replacement of the existing primary screen with a new screen and the replacement of the existing secondary screen with the existing primary screen and for the replacement of an existing baghouse (C-11) with a large capacity baghouse. The Emission Point IDs, Source ID numbers and baghouse designation will not change.

The proposed Title V modification (MM04) incorporates the requirements of a Class II General Permit application (G60-C012A) for the installation of a new natural gas-fired emergency generator that will replace an existing emergency generator.

### Emissions Summary

The change in emissions as a result of this modification is as follows:

*For MM03:*

Plantwide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
PM <sub>10</sub>	0.66 Increase
Total PM	0.82 Increase

*For MM04:*

Plantwide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
PM <sub>10</sub>	0.0019 Increase
Total PM	0.0019 Increase
NO <sub>x</sub> + THC	0.0032 Increase
CO	0.0082 Increase
SO <sub>2</sub>	5.79E-05 Increase
Total HAPs	3.19E-03 Increase

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of PM<sub>10</sub> and NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, Kingsford Manufacturing Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

#### Federal and State:

45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR16	Standards Of Performance For New Stationary Sources
45CSR34	Emission Standards For Hazardous Air Pollutants
45CSR30	Operating Permit Requirement.
40 C.F.R. 60, Subpart JJJJ	Standards Of Performance For Stationary Spark Ignition Internal Combustion Engines

40 C.F.R. 63, Subpart ZZZZ

National Emissions Standards for Hazardous Air Pollutants for  
Stationary Reciprocating Internal Combustion Engines

State Only:

N/A

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1608G	August 20, 2012	
G60-C012A	August 21, 2012	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

- 1) The "Emission Units" table was updated to reflect the installation dates for "E-02-02," and "E-02-03." The equipment description was changed for "E-08-03H." A row was added for Source ID "E-0B-02" (emission point "S-36") for the new Emergency Generator. The Equipment Description and ID," "Year Installed/Modified" and "Design Capacity or Allowable Limit" information for Emission point S-13 was revised to reflect the dust collector replacement.
- 2) Condition 8.1.4. was revised to update the language as revised in permit R13-1608G.
- 3) Section 11 was revised to include the new Emergency Generator.
  - Emission limits for the emergency generator were added in condition 11.1.1.
  - "Section 8" of Rule 13 general permit G60-C was added to condition 11.1.2.
  - The 40 CFR 63 Subpart ZZZZ requirement to meet the requirements of 40 CFR 60 Subpart JJJJ was added in 11.1.3. No further requirements apply under 40 CFR 63 Subpart ZZZZ pursuant to 40 CFR §63.6590(c)(1).

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR Part 64 CAM determinations are not applicable for minor modifications.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Not Applicable for minor modifications.

Ending Date: N/A

All written comments should be addressed to the following individual and office:

Frederick Tipane  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Not applicable.